

PSJ9 Exh 2

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

- - -

3 IN RE: NATIONAL : HON. DAN A.
4 PRESCRIPTION OPIATE : POLSTER
5 LITIGATION : MDL NO. 2804

6 This document relates to: : Case No. 17-MD-2804

7 The County of Summit, Ohio : :
8 Ohio et al. v. Purdue Pharma : :
9 L.P., et al., Case No. : :
10 17-OP-45004 : :

11 The County of Cuyahoga v. : :
12 Purdue Pharma Purdue Pharma : :
13 L.P., et al., Case No. : :
14 18-OP-45090 : :

- - -

15 Friday, May 10, 2019
16 Volume II

17 - - -
18 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
19 CONFIDENTIALITY REVIEW

20 - - -
21 Videotaped deposition of
22 CRAIG J. MCCANN, Ph.D., CFA, taken pursuant
23 to notice, was held at the law offices of
24 Morgan Lewis & Bockius, 1111 Pennsylvania
25 Avenue, NW Washington, DC 20004, beginning
26 at 9:08 a.m., on the above date, before
27 Amanda Dee Maslynsky-Miller, a Certified
28 Realtime Reporter.

- - -

29 - - -
30 GOLKOW TECHNOLOGIES, INC.
31 877.370.3377 ph | 917.591.5672 fax
32 deps@golkow.com

1 Q. And the record will reflect
2 what you said, but I believe that you
3 testified that you would need to verify
4 the extent to which returns were factored
5 into your analysis, but that in any
6 event, returns constituted a de minimus
7 amount of the transactions you reviewed.

8 A. Yes.

9 Q. Is that a fair summary of
10 your testimony?

11 A. Yes.

12 Q. In a data set as large as
13 the one that you reviewed concerning the
14 shipments of opioids into Cuyahoga and
15 Summit County, do you consider de minimus
16 to be 1 percent?

17 A. I'd have to think through
18 the context a little bit.

19 But in some contexts, 1
20 percent would be de minimus and in other
21 contexts not. And it depends on -- let
22 me leave it at that.

23 Q. Okay. If returns
24 constituted about 1 percent of the total